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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
The Development of Operational,)
Technical and Spectrum Requirements)
for Meeting Federal, State and Local)
Public Safety Communication)
Requirements Through the Year 2010)
)
Establishment of Rules and)
Requirements for Priority Access)
Service)

WT Docket No. 96-86

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Date: September 22, 2000

To: Wireless Telecommunications Bureau

**COMMENTS OF THE STATE OF OHIO,
DEPARTMENT OF ADMINISTRATIVE SERVICES**

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**Comments of the State of Ohio,
Department of Administrative Services**

The Department of Administrative Services of the State of Ohio (hereinafter "State") is currently implementing a statewide digital voice and data radio communications system to serve the public safety and service needs of our citizens. This system, the Multi-Agency Radio Communications System (MARCS) has been in development over the last 5 years with an estimated completion date of late 2003 at a cost of \$272 million dollars.

Due to shortages in both funding as well as available spectrum, MARCS was not designed for inclusion of all county and local government entities. If additional spectrum in the 700 MHz band (764-776 MHz and 794-806 MHz) is made available, MARCS will have expansion opportunities to include other state and local agencies.

The state of Ohio is pleased to submit the following comments on WT Docket No. 96-86:

1. The state agrees with the Federal Communications Commission (FCC) definition of "interoperability" and would like to emphasize the availability for designated interoperability frequencies to itinerant users. A public safety vehicle traveling in an unfamiliar part of the state or through another state must have a means of contacting aid if necessary. Since access to a trunked system requires pre-registration or programming for authorization, trunking does not offer a viable communication's path to the itinerant vehicle trying to report a highway emergency.

The allowance of localized trunking on tactical channels may be beneficial in some instances. For instance, during an in-county emergency, a county system trunking these channels may offer a more effective and efficient command and control. The primary calling channel should not be trunked in order to be available to anyone at any time. The why's, when's and how's of de-trunking should be clearly defined in the Memorandum Of Understanding and Sharing Agreements.

2. The state agrees with the flexible option of 25 KHz operations on the interoperability channels to allow data transfer between agencies, such as local fingerprint and mug-shot files.
3. Administrative Oversight of the Interoperability Channels: The state agrees with the position of the National Coordinating Committee (NCC) and would form a State Interoperability Executive Committee (SIEC) to assume responsibility for these channels. The Department of Administrative Services would be willing to chair/oversee this committee, which should consist of eligible users, to perform this function.

We feel that the Regional Planning Committee (RPC) should formulate any interoperability plan, as this group would be larger and more representative of the user group than the SIEC. If the Ohio RPC requests that the state hold these licenses, who will provide the necessary infrastructure? No one agency, including the state, can afford to purchase and position mutual aid base stations statewide.

4. Channel Designation and Priority: The state agrees with the Commission concerning the necessity for a priority scheme and further feel that any conflicts could be eliminated by the SIEC rules for participation. These rules would be fully defined and agreed upon at the time of an agencies application. Codification of these rules may limit the flexibility of the RPC and SIEC.

The state agrees in principle with the NCC's priority level recommendations but is unfamiliar with those of the National Communications System (NCS). As long as these recommendations are not codified and left to the local RPC for interpretation, the state supports the recommendations.

5. Calling Channels: The state does not believe that two interoperability channels being designated as Calling Channels are enough. MARCS's statewide 800 MHz system currently has four interoperability channels, which are allocated in each quadrant of the state. This would limit the obligation of resources to a smaller geographic area.

6. Narrowband Digital Voice Standards for Interoperability Channels: The state agrees that adoption of the TIA/25 standard is a logical approach to clear the way for the manufacturers to proceed with product development. Adoption of this standard will also allow compatibility with many users in the existing 800 MHz NPSPAC band as well as expansion capabilities in the 700 MHz bands.
7. Narrowband Low Speed Data Transmission Standard and Channel Reservation: The state agrees with the Commission assigning two channels to interoperable data however, the RPC must have the flexibility to assign more channels to meet future data transfer demands. Adopting the Project 25 data standard will allow compatibility with many existing 800 MHz systems.
8. Encryption: The state agrees that encryption should be allowed in some circumstances but does not endorse the use of encryption on the interoperability channels. Since there is no encryption "standard", the potential for multiple encryption schemes seems likely. The state recommends that during emergency situations encryption not be permitted on the interoperability channels.
9. Federal Use of the Interoperability Spectrum: Several users of MARCS frequently work closely with various Federal agencies and would welcome sharing this spectrum. Our Emergency Management Agency works with FEMA, Natural Resources with National Parks, Forestry, BLM and others, Highway Patrol with FBI, Secret Service, ATF and more. From time to time even some of our small users, such as the Food Stamp Fraud investigations section have interoperability needs with federal agencies.
10. Pre-coordination Database: The state strongly supports the NCC's recommendation of a pre-coordination database. Being that four entities are authorized to coordinate and process 700 MHz applications, a shared database is essential to providing accurate frequency availability.

Under the NPSPAC scheme, Ohio is one complete region and anticipates a similar configuration for the 700 MHz band. One database would allow Ohio to work closely with adjacent state RPC's, which will mitigate sources of potential conflict as well as the data being updated in a timely fashion.

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In conclusion, the state commends the Commission for chartering the NCC and congratulates them for their diligence. Ohio hopes to become more active on both the state and national level in the future.

Ohio would like to thank the Commission for seeking comments on this proposed rule making and are pleased to submit these comments.

Respectfully submitted,

A handwritten signature in cursive script, reading "Raymond R. Smith".

Raymond R. Smith
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